

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

UNITED STATES OF AMERICA,
Plaintiff

V.

**CITGO PETROLEUM CORPORATION,
CITGO REFINING AND CHEMICALS
COMPANY, L.P.,**
Defendants

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CRIMINAL ACTION NO. C-06-563

**MOTION OF ADDITIONAL COMMUNITY MEMBER TO BE DECLARED VICTIM
UNDER THE CRIME VICTIM RIGHTS ACT**

COMES NOW, FRANK PEREZ, a community member who moves the Court to be declared a victim under the Crime Victim Rights Act, 18 U.S.C. § 3771(d)(1). In support of his request to be declared a victim, Mr. Perez incorporates by reference herein the arguments and authorities cited in the Motion of Community Members to be Declared Victims Under the Crime Victim Rights Act (Dkt. No. 776) and Reply in Support of Motion of Community Members' to be Declared Victims Under the Crime Victim Rights Act (Dkt. No. 798). During the time that CITGO was operating tanks 116 and 117 in violation of the Clean Air Act, Mr. Perez worked at machine shops in area of Corpus Christi east of the CITGO. During those years, he would smell a strong smell in the air that was like the smell of super glue but that burned his nose and eyes. He and his fellow employees would get sick every time they smelled that smell, and sometimes it made them vomit.

Mr. Perez has been harmed by the crimes of which CITGO was convicted.

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Wherefore, Frank Perez requests the Court recognize him to be a victim entitled to the rights and protections enumerated in the Crime Victim Rights Act and for such further relief to which the Court finds him to be entitled.

Respectfully submitted,

s/ Paula Pierce

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Reply in Support of Motion of Community Members to be Declared Victims Under the Crime Victim Rights Act has been served on counsel of record identified below.

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Dated September 10, 2012

s/ Paula Pierce
Paula Pierce